

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
IN SEATTLE**

# WESTRIDGE TOWNHOMES OWNERS ASSOCIATION,

Plaintiff,

V.

GREAT AMERICAN ASSURANCE  
COMPANY, a foreign insurance  
company, as successor to  
AGRICULTURAL INSURANCE  
COMPANY; GREENWICH  
INSURANCE COMPANY, a foreign  
insurance company,

## Defendants.

No. C16-1011 RSM

STIPULATED MOTION &  
PROPOSED ORDER TO EXTEND  
DISCOVERY DEADLINE

20 Plaintiff Westridge Townhomes Owners Association and Defendants Great American  
21 Assurance Company and Greenwich Insurance Company (collectively the “Parties”) submit

STIPULATED MOTION & ORDER TO EXTEND  
DISCOVERY DEADLINE - 1

**CASE NO. 2:16-cv-01011 RSM**

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1 the following stipulated motion to extend the discovery deadline for the purpose of taking two  
2 depositions.

3 The current discovery completion date is December 18, 2017 (*see Dkt. 37*). Plaintiff  
4 has requested the depositions of two of Defendants' experts, Jim Perrault and Dennis Smith.  
5 These two witnesses are not available for deposition until after the current discovery cut-off.  
6 The Parties bring this Stipulated Motion and ask that the Court extend the discovery  
7 completion date by four days to complete the depositions of Mr. Perrault and Mr. Smith. The  
8 witnesses have indicated that they are available for deposition beginning December 19.

9 Good cause exists to extend the deadline to depose the above-named witnesses and  
10 doing so will not prejudice any party. Moreover, a short extension of this deadline will not  
11 impact the other dates in the Court's Order.

12 DATED this 5th day of December 2017.

13 HARPER | HAYES PLLC

BETTS, PATTERSON & MINES, P.S.

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Assurance Company

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23 STIPULATED MOTION & ORDER TO EXTEND  
DISCOVERY DEADLINE - 2

CASE NO. 2:16-cv-01011 RSM

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17 American Assurance Company and  
18 Greenwich Insurance Company

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23 STIPULATED MOTION & ORDER TO EXTEND  
DISCOVERY DEADLINE - 3

CASE NO. 2:16-cv-01011 RSM

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10 Company

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23 STIPULATED MOTION & ORDER TO EXTEND  
DISCOVERY DEADLINE - 5

CASE NO. 2:16-cv-01011 RSM

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